

EXHIBIT A

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ROBERT JOHNSON,

Claimant,

-against-

PARKING SYSTEMS PLUS, INC.,

Respondent.

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**DECLARATION OF
JOSEPH SULLIVAN**

Pursuant to 28 U.S.C. § 1746, I, JOSEPH SULLIVAN, declares, under penalty of perjury, that the following is true and correct to the best of my knowledge and ability:

1. I am a resident of the State of New York and am over 18 years of age.
2. In the spring of 2023, I worked alongside with Robert Johnson (“Johnson”) a black man, at the Parking Systems (“Company”) parking facility, located in Valley Stream, New York.
3. With the Company, I worked as a parking lot attendant at the Company’s Northport VA Medical Center. As a parking lot attendant my duties were parking cars for guests.
4. During my tenure, Robert was also employed as a parking lot attendant. Our shift supervisor was Wesley last name unknown, (“Wesley”) a white male, who was in charge of training and directing the staff on what they needed to do.
5. Throughout my entire tenure, approximately four months, on multiple occasions, and with regularity, I personally heard and witnessed Wesley refer to Robert as a “nigger” (“n-word”) and other racial epithets.
6. Specifically, when Wesley referred to Robert he, on several occasions, he would use the n-word instead of referring to Robert by name. Examples include, “come over here n-word,” “hey, n-word, I’m talking to you.”
7. On payday, Fridays, Wesley would openly make discriminatory stereotypical statement about Robert spending his earnings on “crack and whores” a blatant discriminatory insult against black people.
8. It was noticeable that Robert was bothered and infuriated by the discriminatory insults levied on him by Wesley.

9. Wesley discriminatory and racist rants did not start or end with Robert, in May 2023, after Muslim employee named Sommer got a haircut, Wesley referred to him as a “clean cut terrorist”. As a result of this statement Sommer resigned. However, his resignation did not happen without giving Jimmy, the owner of the company proper notice of the discrimination. Upon information and belief, Sommer complained to Jimmy about the discrimination, but no action was taken against Wesley nor did his discriminatory behavior stop.

Dated: Aug 3, 2023

Joseph Sullivan
Joseph Sullivan (Aug 3, 2023 15:46 EDT)

Joseph Sullivan